

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Court File No. 14-cv-01467 (DWF-JSM)

Walter Louis Franklin, II, Trustee for the
Estate of Terrance Terrell Franklin,

Plaintiff,

**DECLARATION OF
MICHAEL B. PADDEN**

vs.

Lucas Peterson, et al.,

Defendants.

1. My name is Michael B. Padden. I am one of the attorneys representing Plaintiff.

CD-Rom

2. Attached hereto as Exhibit 1 is video on CD-Rom that depicts the outside of the apartment complex on Lyndale Avenue where MPD personnel initially had contact with Terrance Franklin. This was CD-Rom 28 produced by Defendants and reproduced by Plaintiff's counsel for the Court's viewing.

Depositions

3. Attached hereto as Exhibit 2 is a true and correct copy of a portion of the deposition transcript of Timothy Dolan for this matter.
4. Attached hereto as Exhibit 3 is a true and correct copy of the deposition transcript of Mark Kaspszak for this matter.
5. Attached hereto as Exhibit 4 is a true and correct copy of the deposition transcript of Gerald Moore for this matter.
6. Attached hereto as Exhibit 5 is a true and correct copy of the deposition transcript of

Antohny Oberlander for this matter.

7. Attached hereto as Exhibit 6 is a true and correct copy of the deposition transcript of Stephen Sporny for this matter.


Expert Reports

8. Attached hereto as Exhibit 7 is a true and correct copy of the expert report of Charles W. Drago for this matter.
9. Exhibit 8 is blank.
10. Attached hereto as Exhibit 9 is a true and correct copy of the expert report of Sean L. Harrington for this matter.

Statement; Miscellaneous

11. Attached hereto as Exhibit 10 is a true and correct copy of Supplement # 48, prepared by Dave Scheibel.
12. Attached hereto as Exhibit 11 is a true and correct copy of the Q and A of Sgt. Andrew Stender.
13. Attached hereto as Exhibit 12 is a true and correct copy of a BCA Report which indicates Scheibel's DNA was on the MP5 when analyzed.
14. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed pursuant to 28 U.S.C. § 1746 on today's date July 8, 2016.

Dated: July 8, 2016


Michael B. Padden